

**DEx. 16**

**Lodged Under Seal**

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5 Attorneys for Defendants TRUMP UNIVERSITY, LLC and  
DONALD J. TRUMP  
6  
7

8 **UNITED STATES DISTRICT COURT**  
9 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

10 TARLA MAKAEFF, BRANDON )  
KELLER, ED OBERKROM, SONNY )  
11 LOW, J.R. EVERETT and JOHN )  
BROWN, on Behalf of Themselves and )  
12 All Others Similarly Situated, )  
Plaintiffs, )  
13 )  
14 v. )  
15 TRUMP UNIVERSITY, LLC, (aka )  
Trump Entrepreneur Initiative, LLC, a )  
16 New York Limited Liability Company, )  
DONALD J. TRUMP, and DOES 2 )  
17 through 50, inclusive, )  
Defendants. )

Case No. 10 CV 0940 CAB (WVG)  
CLASS ACTION  
DECLARATION OF KISSY GORDON

DATE: February 12, 2013  
TIME: 2:30 p.m.  
CTRM: 2 — 4<sup>th</sup> Floor

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AND ALL RELATED CROSS-ACTIONS.  
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**DECLARATION OF KISSY GORDON**

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3 I, Kissy Gordon, declare:

4 1. I am over the age of 18 and not a party to this action. The following facts are  
5 based on my own personal knowledge and, if called as a witness, I could testify to them.

6 2. I am providing this declaration freely and voluntarily. I have had the opportunity  
7 to review the contents of this declaration and to make any changes I believe are necessary so that  
8 it is accurate. I understand that Trump University (aka Trump Entrepreneur Initiative) may use  
9 this declaration to support its defense in *Makaeff v. Trump University et al.*, a case described to  
10 me.

11 3. Prior to enrolling in Trump University, my husband and I owned a residential  
12 construction and development company, and still do. We've now owned it for 35 years. It is his  
13 company and I manage the books. At this time, we were looking for something to grow our  
14 business during the down economy. We received a Trump University advertisement in the mail  
15 to attend a one day free seminar, the Fast Track to Foreclosure, in Virginia, in November of  
16 2008. My husband attended and then we decided to enroll in the Trump Gold Elite program, and  
17 become involved in real estate investing by rehabbing properties.

18 4. We had very good mentors throughout our time at Trump University. I wish  
19 however that we would have been able to choose our mentors by being given options, and that it  
20 didn't have to begin right away. But despite this, it still provided a great learning experience.  
21 And when the mentorship schedule did not work with ours, they would work around it and be  
22 accommodating, so that we could come up with something that met our time needs. We can still  
23 call our mentors today, and receive advice and help from them.

24 5. The instructors were fantastic as well. They were very knowledgeable, and  
25 provided exactly what we felt was worth what we paid for. The others at Trump University were  
26 great too. We attended a seminar once, which we felt we didn't understand enough. So after  
27 expressing this, they allowed us to take it a second time at no charge.

28 6. After enrolling, Trump University formed an LLC for us, which we use as a

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DECLARATION OF KISSY GORDON

1 subsidiary of our corporation. We purchased three houses under this LLC, and have rehabbed  
2 two with the third one partially finished. The first is being rented, providing a good cash flow.  
3 The second and third we are trying to sell, but have not been able to yet. We of course  
4 understand this is because of the problems with the economy, and nothing to do with Trump  
5 University.

6 7. As part of the Trump Entrepreneur Initiative programs, we filled out evaluations.  
7 we never felt pressured to say something that was not true on the evaluations, and we filled them  
8 out honestly. I felt they were administered fairly. Every rating I gave my mentor was always  
9 positive, and I still agree with what I said to this day.

10 8. I did not meet or speak with Donald J. Trump as part of my Trump Entrepreneur  
11 Initiative experience, nor did he make any promises to me about the education I would receive.  
12 In purchasing Trump Entrepreneur programs, I understood that I would not be working  
13 personally with Donald J. Trump.


14 9. We really learned a lot from Trump University and have found a modicum of  
15 success. Our mentorships, classes, and learning materials/books provided by Trump University  
16 have really helped us with this. Our objective upon enrolling was to learn how to be better at our  
17 business, how to not make mistakes along the way, and how to be successful in investing, and we  
18 feel that's exactly what we accomplished. If students follow and apply the principles that are  
19 taught to them, and proceed with that by doing the work, then they can have the ability to  
20 succeed and make it happen. I personally never expected Trump to "hold my hand" along the  
21 way, but I'm sure there are other people that did, and they clearly had a misunderstanding of how  
22 the program works.

23 I declare under penalty of perjury under the laws of the United States of America that the  
24 foregoing is true and correct.

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Executed on this 6 day of June 2012, at Manakin Sabot, Virginia.

City State

  
Kissy Gordon

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**DEx. 17**

**Lodged Under Seal**

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5 Attorneys for Defendants TRUMP UNIVERSITY, LLC and  
DONALD J. TRUMP  
6  
7

8 **UNITED STATES DISTRICT COURT**  
9 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

10 TARLA MAKAEFF, BRANDON ) Case No. 10 CV 0940 CAB (WVG)  
KELLER, ED OBERKROM, SONNY )  
11 LOW, J.R. EVERETT and JOHN ) CLASS ACTION  
BROWN, on Behalf of Themselves and )  
12 All Others Similarly Situated, ) DECLARATION OF GREGORY  
LEISHMAN  
13 Plaintiffs, )  
14 v. )  
15 TRUMP UNIVERSITY, LLC, (aka ) DATE: February 12, 2013  
Trump Entrepreneur Initiative, LLC, a ) TIME: 2:30 p.m.  
16 New York Limited Liability Company, ) CTRM: 2 — 4<sup>th</sup> Floor  
DONALD J. TRUMP, and DOES 2 )  
17 through 50, inclusive, )  
18 Defendants. )  
19 \_\_\_\_\_ )  
AND ALL RELATED CROSS-ACTIONS. )  
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**DECLARATION OF GREGORY LEISHMAN**

I, Gregory Leishman, declare:

1. I am over the age of 18 and not a party to this action. The following facts are based on my own personal knowledge and, if called as a witness, I would testify to them.

2. I am providing this declaration freely and voluntarily. I have had the opportunity to review the contents of this declaration and I have made changes that were necessary for accuracy. I understand that Trump University (aka Trump Entrepreneur Initiative) may use this declaration to support its defense in *Makaeff v. Trump University et al.*, a case described to me.

3. For 15 years I have been partner in a company that promotes energy efficient products. Two years ago I received an advertisement in the mail for Trump University, and decided to enroll in their 3 day seminar offered in my hometown of Springfield MA. Following the seminar I felt this might be a good opportunity to work together with my brother Ken who lives in northern New Jersey. Ken and I attended together a 3 day seminar conducted in New Haven Ct. This was my second seminar and was offered at no additional charge. Ken and I decided to move forward and we enrolled in the Trump Gold Elite program.

4. We had our mentorship with Steve Gilpin, and the mentorship was a very valuable exercise and experience. Mr. Gilpin was always accessible, and he provided a high level of insight and knowledge to us to begin our investing. Steve and I are in continued contact and I hold his education abilities in high regard.

5. Equipped with the training and extensive resources we received from Trump, none of which we had prior to Trump, we located, researched, and evaluated hundreds of properties. We have formed three LLC's to use as ownership platforms. As of this date we have purchased 12 properties:

Far Rockaway, NY (1) a 2-family, we did the rehab, now fully rented

New Haven CT (5)

- Two fully rented 3-family units, holing long term.
- One SF purchased at probate, rehabbed and sold



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- One 3-family, rehabbed, and under contract to sell
- One 3-family, rehabbing now, will flip or hold

Philadelphia, PA (6) all new-construction, all 2 or 3-family, two already completed and full rented.

We used our Trump training and Trump resources with all of these purchases, especially the properties we acquired in foreclosure.

6. As part of the Trump Entrepreneur Initiative programs, I filled out evaluations. I was not pressured in any way to write anything that was not true and accurate, and I filled them out honestly. I feel they were administered fairly. Every rating I gave my mentor was positive, and I still agree with those positive ratings today.

7. I neither met nor spoke with Donald J. Trump as part of my Trump Entrepreneur Initiative experience, and no one made any promises about the education I would receive. In purchasing Trump Entrepreneur programs, I understood that I would not be working personally with Donald J. Trump.

8. Before enrolling, Trump University made it very clear they could provide the right education for their students, but in order to be successful, it would require work and dedication on the student's part. They made it clear that simply enrolling does not lead to success. I had a great learning experience and have only good things to say about Trump University. I have not suffered any losses in my investments, and I am looking forward to continuing in the field of real estate investment.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 14 day of June 2012, at Springfield, MA.  
City State

  
\_\_\_\_\_  
Gregory Leishman

**DEx. 18**

**Lodged Under Seal**

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DONALD J. TRUMP  
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8 **UNITED STATES DISTRICT COURT**  
9 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

10 TARLA MAKAEFF, BRANDON ) Case No. 10 CV 0940 CAB (WVG)  
KELLER, ED OBERKROM, SONNY )  
11 LOW, J.R. EVERETT and JOHN ) CLASS ACTION  
BROWN, on Behalf of Themselves and )  
12 All Others Similarly Situated, ) DECLARATION OF STEPHEN  
Plaintiffs, ) NESBIT  
13 v. )  
14 TRUMP UNIVERSITY, LLC, (aka )  
Trump Entrepreneur Initiative, LLC, a ) DATE: February 12, 2013  
15 New York Limited Liability Company, ) TIME: 2:30 p.m.  
DONALD J. TRUMP, and DOES 2 ) CTRM: 2 — 4<sup>th</sup> Floor  
16 through 50, inclusive, )  
17 Defendants. )  
18 AND ALL RELATED CROSS-ACTIONS. )  
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**DECLARATION OF STEPHEN NESBIT**

I, Stephen Nesbit, declare:

1. I am over the age of 18 and not a party to this action. The following facts are based on my own personal knowledge and, if called as a witness, I could testify to them.

2. I am providing this declaration freely and voluntarily. I have had the opportunity to review the contents of this declaration and to make any changes I believe are necessary so that it is accurate. I understand that Trump University (aka Trump Entrepreneur Initiative) may use this declaration to support its defense in *Makaeff v. Trump University et al.*, a case described to me.

3. Around the time of November 2009, I had made the decision to follow my aspirations in becoming involved in real estate investing, which I had no experience in. I had been running a software company at the time, when I received an advertisement in the mail for Trump University to attend a free seminar. After that I signed up for one of the three day classes. I felt Trump University was the right program for me to further enroll in, so I signed up for the mentorship program.

4. My mentorship was with Johnny Horton, who was terrific. He gave me directions, always answered all my questions, and was there to help me through many things, including the process of purchasing my first property. He helped me learn the right techniques, and made the process so much quicker than if I had done it on my own. It was very worthwhile to have him; he provided me with exactly what I was looking for and what I needed. Johnny always gave great assistance and knowledge, and I never had any complaints.

5. I also found the classes and course materials very helpful. The classes provided a good overview of a lot of different techniques to investing. They were great because they helped me decide if I wanted to continue to pursue this and go on to the next step. The instructor was also great at keeping everyone on top of the lessons, as it was an immense amount to learn, if you chose to really pay attention. You could learn a lot in a short amount of time; I went from zero knowledge, to all of a sudden knowing how to make my first investment, so it was

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DECLARATION OF STEPHEN NESBIT

1 definitely great. I still use the course materials and notes that I took to this day, all the time.

2 6. I made my first offer to purchase my first investment property in late December of  
3 2009 and actually purchased my first property in January 2010. Since then, I have made offers  
4 on close to 20 properties and purchased around 10 properties. All the properties I purchased  
5 were in foreclosure; I rehabbed them, and then flipped the properties or am still in the process of  
6 selling them. I've made a good profit, and have done extremely well on some. Others not as  
7 much, but that is due to the economy and the fall in the market. Despite this, I have never taken  
8 a loss, and I'm still continuing to make investment purchases today.

9 7. As part of the Trump Entrepreneur Initiative programs, I filled out evaluations. I  
10 never felt pressured to say something that was not true on the evaluations, and I filled them out  
11 honestly. I felt they were administered fairly. Every rating I gave my mentor was always  
12 positive, and I still agree with what I said to this day.

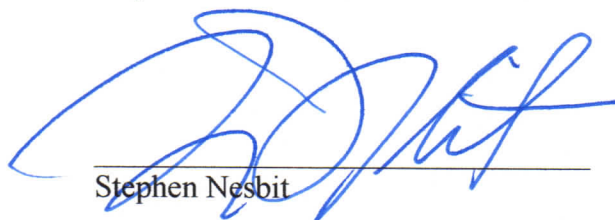
13 8. I did not meet or speak with Donald J. Trump as part of my Trump Entrepreneur  
14 Initiative experience, nor did he make any promises to me about the education I would receive.  
15 In purchasing Trump Entrepreneur programs, I understood that I would not be working  
16 personally with Donald J. Trump.

17 9. Trump University did a great job of exposing me to the many possible ways to  
18 invest in real estate, and how to make money at it. They give you the fundamental base level  
19 knowledge that you need, and if you execute it on your own and apply it to the markets you  
20 choose, which is how it should be, then you can make things happen.

21 I declare under penalty of perjury under the laws of the United States of America that the  
22 foregoing is true and correct.

23 Executed on this 15 day of June 2012, at Dallas, Texas.

24 City State

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27   
28 Stephen Nesbit

**DEx. 19**

**Lodged Under Seal**

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5 Attorneys for Defendants TRUMP UNIVERSITY, LLC and  
DONALD J. TRUMP  
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8 **UNITED STATES DISTRICT COURT**  
9 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

10 TARLA MAKAEFF, BRANDON )  
KELLER, ED OBERKROM, SONNY )  
11 LOW, J.R. EVERETT and JOHN )  
BROWN, on Behalf of Themselves and )  
12 All Others Similarly Situated, )  
Plaintiffs, )  
13 )  
14 v. )  
15 TRUMP UNIVERSITY, LLC, (aka )  
Trump Entrepreneur Initiative, LLC, a )  
16 New York Limited Liability Company, )  
DONALD J. TRUMP, and DOES 2 )  
17 through 50, inclusive, )  
Defendants. )  
18 )

Case No. 10 CV 0940 CAB (WVG)  
CLASS ACTION  
DECLARATION OF PAUL R. CANUP

DATE: February 12, 2013  
TIME: 2:30 p.m.  
CTRM: 2 — 4<sup>th</sup> Floor

19 AND ALL RELATED CROSS-ACTIONS.  
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**DECLARATION OF PAUL CANUP**

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I, Paul R. Canup, declare:

1. I am over the age of 18 and not a party to this action. The following facts are based on my own personal knowledge and, if called as a witness, I could testify to them.

2. I am providing this declaration freely and voluntarily. I have had the opportunity to review the contents of this declaration and to make any changes I believe are necessary so that it is accurate. I understand that Trump University (aka Trump Entrepreneur Initiative) may use this declaration to support its defense in *Makaeff v. Trump University et al.*, a case described to me.

3. Prior to enrolling in Trump University I did not have experience in real estate as far as investing or anything related. I had never searched for, nor purchased real estate for income purposes. I did have experience however in buying and selling a few homes, but those were for the sole purpose to live in. I had been working in project management for a chemical company when I decided I wanted to begin a new career, and become involved in real estate investing. It was around this time that I heard an advertisement on the radio for a DVD set introducing Trump University ( Wealth Builder’s Blueprint). I ordered it and then decided to attend the free seminar in 2009. It was a bit of a slow process to become involved since I was still working full time, but it was definitely manageable.

4. Following the free seminar, I signed up for a three day retreat in August of that year, and then enrolled in the Trump Gold Elite program. Over the next year and a half, I attended numerous retreats all over the country. These events were what I really valued the most about my experience with Trump University. They were packed with information, and I took a large amount of notes, which I still refer to to this day, and use on an ongoing basis. The Trump University documentation and the large volume of information delivered by the presenters provided the foundation and roadmap for everything I do. The information provided, was unique and found nowhere else to my knowledge. By learning the course material, I have the

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DECLARATION OF PAUL R. CANUP



1 confidence to act on the knowledge and successfully execute the tasks needed to take advantage  
2 of the knowledge.

3 5. In late 2010, I utilized the Trump website (Foreclosure Deal Source) to purchase  
4 my first investment property in California, and with the knowledge I gained from the Trump  
5 University training, I was able to successfully interview, select, and set up a power team for my  
6 business, with an attorney, property manager, contractors, etc. Then a month later, I bought my  
7 second property in California. The rehabs were completed and renters were literally standing at  
8 the door during the rehab ready to sign leases. The first lease started in January 1, 2011, and  
9 both properties have been rented full time since their rehabs were completed. I have hired a  
10 property management company to manage them for me, as I reside in another state, and the  
11 property manager has done a great job! Both of these properties have been continuously  
12 producing a good cash flow and profit since day one.

13 6. In 2011, I went to Detroit and purchased a total of five properties there between  
14 April and September. I have rehabbed those properties and I am currently renting all five, with  
15 an ROI of 16 to 22 percent.

16 7. Shortly after these purchases, I then invested in a raw land property in Texas.  
17 After a presentation to the local city council, I was successful in placing the land under contract  
18 for double my original investment for a new city park. My project was submitted in a state-wide  
19 competition for the best architectural project, and won the state-wide, first place award in this  
20 competition as the best project of the year. There is no way I could have managed this land  
21 acquisition and the sales contract without the solid foundation provided by the Trump University  
22 training and insight to real estate investing.

23 8. All the properties I have invested in I consider an amazing and big success. My  
24 plans are to continue making investments, and in the next couple of years, to transition into real  
25 estate as my new career. Trump University provided me with several approaches to real estate  
26 investing. Since to date, I have only utilized part of this training, I look forward to the  
27 adventures ahead utilizing some of the other approaches, especially commercial real estate/multi-  
28 family. The training and insights provided by the presenters have been priceless.

1           9.       I attended all of the Trump University training retreats, and even one event twice.  
2 I have worked to take advantage of the training by implementing what I learned. For instance,  
3 the Wealth Preservation training hosted by J.J. Childers was used to set up my business structure  
4 and strategy. I now have two LLC's and an LP that hold property, a financial LLC to finance  
5 property acquisitions, and a C Corporation.

6           10.      As part of the Trump Entrepreneur Initiative programs, I was asked to fill out  
7 evaluations. I never felt pressured to say something that was not true on the evaluations, and I  
8 filled them out honestly. I felt they were administered fairly, with no bias. I prepared a Field  
9 Mentor Evaluation Form after my 3-day field mentorship. I gave my field mentor an  
10 EXCELLENT overall rating of 5, the highest rating. From my Overall Experience question, I  
11 stated, "*...it was great and better than expected. It was action packed and a lot of valuable time*  
12 *was devoted to discussing what I needed to do to fill gaps in my knowledge and understanding.*  
13 *Fast-paced, approaching mental overload!*". And, I still agree with what I said to this day.

14           11.      I did not meet or speak with Donald J. Trump as part of my Trump Entrepreneur  
15 Initiative experience, nor did he make any promises to me about the education I would receive.  
16 In purchasing Trump Entrepreneur programs, I understood that I would not be working  
17 personally with Donald J. Trump.

18           12.      My experience at Trump University has greatly helped me to advance  
19 successfully in the world of real estate investing. I feel that if you study long and hard, will  
20 devote yourself to understand and master the material, you will be successful. I never felt there  
21 were ever any false promises or guarantees made by anyone at Trump. Students should know  
22 when entering this field, that the real estate business is difficult, and they should expect to put in  
23 a lot of self disciplined work. There is a lot to learn, so the learning process has been long, but I  
24 have been able to do some amazing things, and seeing good success. It really works!

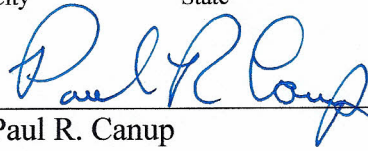
25           I declare under penalty of perjury under the laws of the United States of America that the  
26 foregoing is true and correct.

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Executed on this 3rd day of June 2012, at Lafayette, Louisiana .

City State

  
\_\_\_\_\_  
Paul R. Canup

**DEx. 20**

**Lodged Under Seal**

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8 **UNITED STATES DISTRICT COURT**  
9 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

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KELLER, ED OBERKROM, SONNY )  
11 LOW, J.R. EVERETT and JOHN ) CLASS ACTION  
BROWN, on Behalf of Themselves and )  
12 All Others Similarly Situated, ) DECLARATION OF ROBERT  
MULACK  
13 Plaintiffs, )  
14 v. )  
15 TRUMP UNIVERSITY, LLC, (aka ) DATE: February 12, 2013  
Trump Entrepreneur Initiative, LLC, a ) TIME: 2:30 p.m.  
16 New York Limited Liability Company, ) CTRM: 2 — 4<sup>th</sup> Floor  
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AND ALL RELATED CROSS-ACTIONS. )  
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**DECLARATION OF ROBERT MULACK**

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3 I, Robert Mulack, declare:

4 1. I am over the age of 18 and not a party to this action. The following facts are  
5 based on my own personal knowledge and, if called as a witness, I could testify to them.

6 2. I am providing this declaration freely and voluntarily. I have had the opportunity  
7 to review the contents of this declaration and to make any changes I believe are necessary so that  
8 it is accurate. I understand that Trump University (aka Trump Entrepreneur Initiative) may use  
9 this declaration to support its defense in *Makaeff v. Trump University et al.*, a case described to  
10 me.

11 3. Prior to enrolling in Trump University, I worked for Wal-Mart, and had no  
12 experience in real estate. I had known for awhile that I wanted to learn how and to start  
13 investing in real estate. I happened to see an advertisement for Trump University offering a free  
14 seminar. After attending, I decided to enroll, and signed up for one of the three day seminars in  
15 Orlando; Fast Track to Foreclosure Investing. This was around the beginning of 2008.

16 4. While I was a student, I began making my first of many purchases of properties,  
17 all in Florida. My first property I bought in March of 2008. It's a single family home which I  
18 still own, and rent out at a profit. I now have a total of nine properties. Seven are all similar to  
19 the first; single family homes which I currently rent out. The other two are a triplex and a  
20 duplex, which I also rent out.

21 5. I found the classes and course materials extremely helpful and beneficial. I  
22 especially found the website to be useful. It was very interactive and gave me everything I  
23 needed. I made use of a good amount of info from it, including the lease forms that are provided,  
24 which I use for all of my rental properties.

25 6. As part of the Trump Entrepreneur Initiative programs, I filled out evaluations. I  
26 never felt pressured to say something that was not true on the evaluations, and I filled them out  
27 honestly. I felt they were administered fairly. Every rating I gave my mentor was always  
28 positive, and I still agree with what I said to this day.

---

DECLARATION OF ROBERT MULACK

1           7.     I did not meet or speak with Donald J. Trump as part of my Trump Entrepreneur  
2 Initiative experience, nor did he make any promises to me about the education I would receive.  
3 In purchasing Trump Entrepreneur programs, I understood that I would not be working  
4 personally with Donald J. Trump.

5           8.     I was very happy and satisfied throughout the year I was a student at Trump  
6 University. I never felt like they made promises of any kind. All they simply did was provide  
7 you with the tools and resources for you to put to use, in order to learn the world of real estate  
8 investing. Of course you need to do the work yourself.

9           I declare under penalty of perjury under the laws of the United States of America that the  
10 foregoing is true and correct.

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Executed on this 13 day of June 2012, at Ormond Beach, FL.

City State

  
\_\_\_\_\_  
Robert Mulack

**DEx. 21**

**Lodged Under Seal**



1 David K. Schneider (CSB 139288)  
YUNKER & SCHNEIDER  
2 655 West Broadway, Suite 1400  
San Diego, California 92101  
3 Telephone: (619) 233-5500  
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4 Email: dks@yslawa.com

5 Attorneys for Defendants TRUMP UNIVERSITY, LLC and  
DONALD J. TRUMP  
6  
7

8 **UNITED STATES DISTRICT COURT**

9 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

10	TARLA MAKAEFF, BRANDON	)	Case No. 10 CV 0940 CAB (WVG)
	KELLER, ED OBERKROM, SONNY	)	
11	LOW, J.R. EVERETT and JOHN	)	<u>CLASS ACTION</u>
	BROWN, on Behalf of Themselves and	)	
12	All Others Similarly Situated,	)	DECLARATION OF SCOTT
		)	TALHELM
13	Plaintiffs,	)	
		)	
14	v.	)	
		)	
15	TRUMP UNIVERSITY, LLC, (aka	)	DATE: February 12, 2013
	Trump Entrepreneur Initiative, LLC, a	)	TIME: 2:30 p.m.
16	New York Limited Liability Company,	)	CTRM: 2 — 4 <sup>th</sup> Floor
	DONALD J. TRUMP, and DOES 2	)	
17	through 50, inclusive,	)	
		)	
18	Defendants.	)	
		)	
19	_____ )		
	AND ALL RELATED CROSS-ACTIONS. )		
20	_____ )		

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**DECLARATION OF SCOTT TALHELM**

I, Scott Talhelm, declare:

1. I am over the age of 18 and not a party to this action. The following facts are based on my own personal knowledge and, if called as a witness, I could testify to them.

2. I am providing this declaration freely and voluntarily. I have had the opportunity to review the contents of this declaration and to make any changes I believe are necessary so that it is accurate. I understand that Trump University (aka Trump Entrepreneur Initiative) may use this declaration to support its defense in *Makaeff v. Trump University et al.*, a case described to me.

3. Before joining Trump University, I was an engineer for Intel. I had no real estate experience, aside from owning two homes which were for the sole purpose of residing in with my family. In March of 2008, my wife heard about Trump University from a friend of hers, who had attended the free seminar, and loved it. This is what encouraged me to enroll and thus become a student of Trump University.

4. After joining Trump University, I signed up for my first three day weekend seminar and liked it. This course was the “Wealth Building Weekend”, with Keith Bradshaw, who was very informed. Before I attended, I was very skeptical about investing in real estate, and didn’t think I could do it. But Keith showed it was all very attainable and possible. My eyes were then opened to a lot of ideas in investing, and my attitude quickly went from pessimistic to optimistic.

5. I was then invited to attend Jim Fletcher’s three day weekend seminar, “Profits from Real Estate” for free. Jim was able to show me how to find money to invest, which I did, and was able to obtain my first investment property.

6. In March of 2009, a year after joining Trump University, I bought my first investment property in Avondale, Arizona. I flipped it four months later for a profit of \$16,842.00. I was able to do this from what I learned from Trump University, as well as my mentor, Troy Peterson.

7. My relationship with my mentor, Troy Peterson, was very positive. We would

1 have phone calls weekly. He taught me how to do research and learn how to navigate and  
2 understand the real estate market in the Phoenix area. The best thing I remember about Troy was  
3 that he really knew how to navigate the market. That is how he was able to help me recognize  
4 how the market fluctuated, how to understand the value of properties in the Phoenix area.

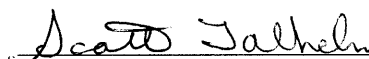
5 8. As part of the Trump Entrepreneur Initiative programs, I filled out evaluations. I  
6 never felt pressured to say something that was not true on the evaluations, and I filled them out  
7 honestly. I felt they were administered fairly. Every rating I gave Troy was always positive, and  
8 I still agree with what I said to this day.

9 9. I did not meet or speak with Donald J. Trump as part of my Trump Entrepreneur  
10 Initiative experience, nor did he make any promises to me about the education I would receive.  
11 In purchasing Trump Entrepreneur programs, I understood that I would not be working  
12 personally with Donald J. Trump.

13 10. At the end of my mentorship, I felt the program was very knowledgeable, fair,  
14 and a good experience.

15 I declare under penalty of perjury under the laws of the United States of America that the  
16 foregoing is true and correct.

17 Executed this 24 th day of May 2012 at 5:30 PM, \_\_\_\_\_.

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19   
20 Scott Talhelm